

NORTHERN DISTRICT

07 CV 7061

Judge Manning

Magistrate Judge Mason

CHRISTOPHER KNOX

C

PLAINTIFF PRO SE

-VS-

JH

RECEIVED

Dec. 17, 2007

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MARRY HENRY; NEORA CHANDLER;

Lt. DAVID SAMBDMAN; Lt. MICHAEL GORMAN; MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

SGT. WICKS; C/O GILLETTE; C/O LIND BLOOM;

C/O HESS; C/O FORD; C/O KENNETH HAMILTON;

Lt. DAVID MITCHELL; DR. GUN; DR. MARVEN POWERS.

R/N MS. SCHAVE; R/N TERRY CALPER; TERRY MCCANN; ET AL.

DEFENDANTS

COMPLAINT FOR; INJUNCTION RELIEF,
DECLARATORY RELIEF, AND DAMAGES

NOW COME PLAINTIFF, CHRISTOPHER KNOX, PROSE, COMPLAIN
OF DEFENDANTS. MARRY HENRY, NEORA CHANDLER, Lt. GORMAN,
Lt. SAMBDMAN; SGT. WICKS, C/O GILLETTE, C/O LIND BLOOM, C/O HESS,
C/O FORD, C/O HAMILTON, Lt. MITCHELL, DR. GUN, DR. POWERS,
R/N MS. SCHAVE, R/N MS. CALPER, AND MCCANN. AND STATES AS
FOLLOWS

NATURE OF CASE

1. PLAINTIFF ALLEGES THAT; IN APRIL/2006, PLAINTIFF
HAD INSERTED AN FOREIGN OBJECT INTO HIS URETHRA, DUE
TO PLAINTIFF SUFFERING FROM A MENTAL DISORDER OF
SELF-MUTILATION WHICH CAUSES PLAINTIFF CUT AND PUT
OBJECTS INTO HIS PENIS (URETHRA)

- 2) • PLAINTIFF ALLEGES THAT; HE CONTESTED THE SURGICAL PROCEDURE AND PRACTICE THAT WERE GOING TO BE USED UPON PLAINTIFF TO REMOVE THE FOREIGN OBJECT FROM PLAINTIFF, URETHRA . . .
- 3) • PLAINTIFF ALLEGES THAT; DEFENDANTS, MS. HENRY, AND MS. CHANDLER, ORDO, THE DEFENDANTS, LT. SAMBDMAN AND LT. GORMAN, TO USE WHATEVER FORCE NECESSARY TO GAIN THE COMPLIANCE OF PLAINTIFF, TO CONSENT TO THE SURGICAL PROCEDURE AND PRACTICE . . .
- 4) • PLAINTIFF ALLEGES THAT; EXCESSIVE USE FORCE, WERE USED UPON PLAINTIFF, NOT FOR THE PURPOSE TO MAINTAIN DISCIPLINE, BUT FOR THE SOLE PURPOSES TO CAUSE HARM TO PLAINTIFF, AND TO INFLECT PAIN AND SUFFERING UPON PLAINTIFF . . .
- 5) • PLAINTIFF ALLEGES THAT; A SURGICAL PROCEDURE AND PRACTICE WERE USED UPON PLAINTIFF WITHOUT ANY ANESTHESIA AND CONSENT OF PLAINTIFF, WHICH INFLECTED SEVERE PAIN AND SUFFERING . . .
- 6) • PLAINTIFF ALLEGES THAT; HE ^{HAD} THREE DISCIPLINARY REPORTS WERE WRITTEN ON PLAINTIFF IN RETALIATION FOR HIS UTILIZING THE GRIEVANCE PROCEDURE AND FOR COMPLAINTING TO OTHER PRISON'S OFFICIAL'S ABOUT THE APRIL 13 2006 INCIDENTS, AND DISCIPLINARY ACTION WERE TAKEN AGAINST PLAINTIFF FOR UTILIZING THE GRIEVANCE PROCEDURE AND FOR COMPLAINTING ABOUT THE APRIL 13, 2006 INCIDENTS, AND TO COVER-UP THE APRIL 13 2006 INCIDENTS, TO JUSTIFY IT . . .

7) • PLAINTIFF ALLEGES THAT; FOR THE ACTIONS AND INACTIONS OF ALL KNOWN AND UNKNOWN DEFENDANTS, PLAINTIFF HAS BEEN SUBJECTED TO INFLICTION AND WORTHEN PAIN AND SUFFERING, DUE TO (A). EXCESSIVE FORCE. (B) DENIAL OF MEDICAL CARE, DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS. (C). ~~RE~~ RETALIATORY CONDUCTS . . . (D). PROCEDURAL AND DUE PROCESS VIOLATIONS

8) • PLAINTIFF ALLEGES THAT; FOR THE ACTIONS AND INACTIONS OF ALL KNOWN AND UNKNOWN DEFENDANTS, CONTINUING TO WILLFULLY VIOLATE PLAINTIFF CLEARLY ESTABLISHED, STATUTORY AND UNITED STATES CONSTITUTIONAL RIGHTS, THAT ARE SECURED UNDER THE FIRST, EIGHT, AND FOURTEENTH AMENDMENTS

EXHAUSTION OF ADMINISTRATIVE REMEDIES

- 9) • PLAINTIFF HAS EXHAUSTED ALL AVAILABLE ADMINISTRATIVE REMEDY, BY FILING, GRIEVANCES, TO HIS COUNSELOR, THE GRIEVANCE-OFFICER, AND APPEALED TO A.R.B. WHICH WERE ALL DENIED

JURISDICTION AND VENUE

- 10) • THIS ACTION IS BROUGHT PURSUANT TO SECTION 42 U.S.C. § 1983, UNDER THE FIRST, EIGHT, AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTIONS. THEREFORE THIS COURT HAS THE JURISDICTION OVER THIS ACTION PURSUANT TO 28 U.S.C. §§ 1331 AND 1343

- 11) • DECLARATORY RELIEF, IS SOUGHT PURSUANT TO 28 U.S.C. §§ 2201 AND 2202 . . VENUE IS PROPER IN THE NORTHERN DISTRICT OF ILLINOIS, UNDER 28 U.S.C. § 1391 (B). BECAUSE ONE OR MORE OF THE DEFENDANTS RESIDES IN THE DISTRICT, AND A SUBSTANTIAL PART OF THE EVENTS AND OMISSIONS GIVING RISE TO THE PLAINTIFF CLAIMS OCCURRED IN THE NORTHERN DISTRICT OF ILLINOIS

LITIGATION HISTORY

- 12) • HAVE YOU EVER FILE A SUIT IN STATE OR FEDERAL COURT? ☒ YES.

- 13) • IF YOUR ANSWER TO QUESTION ¹² (A) IS YES, HOW MANY? 19

- (1). KNOX -VS- PIERSON, 99-616. (2). KNOX -VS- PIERSON. 01-1467.
- (3). KNOX -VS- PIERSON. 01-1316. (4). KNOX -VS- BYRANT. 02-4363.
- (5). KNOX -VS- HAWKINS. 02-06499. (6). KNOX -VS- WAINSCOTT. 03-1429.
- (7). KNOX -VS- SPENCER. 03-1074. (8). KNOX -VS- CARLTON. 03-1327.
- (9). KNOX -VS- SCHOMING. 03-1377. (10). KNOX -VS- COX. 05-1017.
- (11). KNOX -VS- ROBERSON. 04-7765. (12). KNOX -VS- FOX. 06-5247.
- (13). KNOX -VS- MICHEL. 06-0018. (14). KNOX -VS- WALKER. 07-1032.
- (15). KNOX -VS- DR. POWERS. 07-508-WDS. (16). KNOX -VS- KAJTSA. 07-4855.
- (17). KNOX -VS- IYLOLA. 07-0814. (18). KNOX -VS- NAVARR. 07-50053.
- (19). KNOX -VS- BENEFIELD. 07-795-JPG

PLAINTIFF

- 14) • CHRISTOPHER KNOX, IS CURRENTLY INCARCERATED IN THE ILLINOIS DEPARTMENT OF CORRECTIONS, IN TAMMS CORR. CENTER. IN (TAMMS) ILLINOIS

DEFENDANTS

- 15) • DEFENDANT, MARRY HENRY, SERVED AS A ASSISTANT-WARDEN OF OPERATION, OF THE ILLINOIS DEPARTMENT OF CORRECTIONS, AND AS SUCH HAS THE ULTIMATE RESPONSIBILITIES FOR MAINTAINING THE OPERATION OF THE INSTITUTIONS AND INCLUDING DISCIPLINE, AND SECURITY. UPON INFORMATION AND BELIEF, DEFENDANT, MS. HENRY, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED, AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED
DEFENDANT, MS. HENRY, IS SUED IN BOTH HER INDIVIDUAL AND OFFICIAL CAPACITIES

- 16) • DEFENDANT, NEERA CHANDLER, SERVED AS THE CHIEF ADMINISTRATIVE OFFICER, OF THE INSTITUTION'S, AND AS SUCH HAD THE ULTIMATE RESPONSIBILITIES FOR THE ENTIRE OPERATION OF THE INSTITUTION. INCLUDING IMPLEMENTING ALL STATE AND FEDERAL LAWS AND DEPARTMENT POLICIES, PRACTICES, AND PROCEDURE AFFECTING PRISONERS AT THE INSTITUTION. AND UPON INFORMATION AND BELIEF DEFENDANT MS. CHANDLER, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED, AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANT, MS. CHANDLER, IS SUED IN BOTH HER INDIVIDUAL AND OFFICIAL CAPACITIES

17) • DEFENDANTS, DAVID SAMBDMAN, MICHAEL GORMAN, AND DAVID MITCHELL, SERVED AS CORRECTIONAL LIEUTENANTS OF THE ILLINOIS DEPARTMENT OF CORRECTIONS, AND AS SUCH HAS THE RESPONSIBILITIES OF THE SECURITY OF CORRECTIONAL CENTERS. AND UPON INFORMATION AND BELIEF, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANTS. SAMBDMAN, GORMAN, MITCHELL, ARE SUED IN BOTH THEIR INDIVIDUAL'S AND OFFICIAL'S CAPACITIES

18) • DEFENDANT, WICKS, SERVED AS A CORRECTIONAL SERGEANT, OF THE ILLINOIS DEPARTMENT OF CORRECTIONS, AND AS SUCH HAS THE RESPONSIBILITIES OF THE SECURITY OF CORRECTIONAL CENTERS. AND UPON INFORMATION AND BELIEF, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANT, WICKS, IS SUED IN BOTH HIS INDIVIDUAL AND OFFICIAL CAPACITIES

19) • DEFENDANTS. C/O GILLETTE, C/O LINDBLOOM, C/O HESS, C/O FORD, C/O HAMILTON, SERVED AS CORRECTIONAL OFFICERS OF THE ILLINOIS DEPARTMENT OF CORRECTIONS. AND AS SUCH AS A RESPONSIBILITIES FOR SECURITY OF CORRECTIONAL CENTERS. AND UPON INFORMATION AND BELIEF, HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANTS, C/O GILLETTE, C/O LINDBLOOM, C/O HESS, C/O FORD, C/O HAMILTON, ARE SUED IN BOTH THEIR INDIVIDUAL'S AND OFFICIAL'S CAPACITIES.

20) • DEFENDANTS. DR. GNU, DR. POWERS, SERVED HAS MEDICAL DIRECTOR'S, FOR THE ILLINOIS DEPARTMENT OF CORRECTIONS, THEY OVERSEES THE HEALTH CARE UNIT IN THE INSTITUTIONS WHICH THEY IS RESPONSIBLE FOR PROVIDING MEDICAL AND MENTAL HEALTH SERVICES FOR PRISONERS AT THE INSTITUTIONS. AND CONDUCTING PSYCHOLOGICAL EVALUATIONS OF PRISONERS. AND UPON INFORMATION AND BELIEF, THEY HAVE FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED. DEFENDANTS. DR. GNU, DR. POWERS, ARE BOTH SUED IN BOTH THEIR INDIVIDUAL'S AND OFFICIAL'S CAPACITIES • • •

21) • DEFENDANT, TERRY CALIPER, SERVED AS A HEALTH CARE UNIT ADMINISTRATOR, FOR THE ILLINOIS DEPARTMENT OF CORRECTIONS. AND IS RESPONSIBLE TO ENSURE THAT HEALTH CARE SERVICES INCLUDING MEDICAL, DENTAL, AND PSYCHOLOGICAL SERVICES ARE DELIVERED TO THE INMATE POPULATION IN A WAY THAT IS COMMENSURATE WITH THE SERVICES OFFERED IN THE FREE COMMUNITY. AND UPON INFORMATION AND BELIEF, SHE HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED. AND WAS PERSONALLY INVOLVED. IN THE FACTS ALLEGED. DEFENDANT. MS. CALIPER IS SUED IN BOTH HER INDIVIDUAL AND OFFICIAL CAPACITIES.

22) • DEFENDANT, MS. SCHAVE, ■ SERVED AS A NURSE, FOR THE ILLINOIS DEPARTMENT OF CORRECTIONS. AND AS SUCH HAS THE RESPONSIBILITIES OF PROVIDING MEDICAL SERVICES TO PRISONERS. AND UPON INFORMATION AND BELIEF, SHE HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED

AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED.
DEFENDANT, MS. SCHAVE, IS SUED IN BOTH HER —
INDIVIDUAL AND OFFICIAL CAPACITIES . . .

23) . UPON INFORMATION AND BELIEF, ALL UNKNOWN —
DEFENDANTS, SERVED AS EMPLOYEES OF THE ILLINOIS
DEPARTMENT OF CORRECTIONS, AND HAD THE RESPONSIBILITY
TO PERFORM THEIR INDIVIDUALS AND OFFICIAL DUTIES.
AND HAS FIRST-HAND KNOWLEDGE OF THE FACTS ALLEGED.
AND WAS PERSONALLY INVOLVED IN THE FACTS ALLEGED.
ALL UNKNOWN DEFENDANTS, ARE SUED IN BOTH THEIR
INDIVIDUAL'S AND OFFICIAL'S CAPACITIES . . .

EXCESSIVE USE OF FORCE

- 24). PLAINTIFF ALLEGES THAT; HE SUFFERS FROM A SELF-MUTILATION DISORDER; WHICH CAUSES PLAINTIFF, TO CUT ON HIMSELF, AND TO INSERT FOREIGN OBJECTS INTO HIS PENIS
- 25). PLAINTIFF ALLEGES THAT; ON OR ABOUT APRIL / 2006, PLAINTIFF, HAD INSERTED AN OBJECT INTO HIS PENIS. IN WHICH X-RAYS SHOWED THAT PLAINTIFF DID HAVE A FOREIGN OBJECT STUCK INTO HIS PENIS.
- 26). PLAINTIFF ALLEGES THAT; ON OR ABOUT APRIL 13 2006, DEFENDANTS NEERA CHANDLER, MAXEY HENRY, AND DR. GNU, CALL PLAINTIFF TO THE HEALTH CARE UNIT, TO TALK ABOUT THE OBJECT STUCK IN PLAINTIFF PENIS
- 27). PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, ASK PLAINTIFF, DID HE WANT HIM TO REMOVE THE OBJECT? WHICH PLAINTIFF, AT THAT TIME HAD STATED YES
- 28). PLAINTIFF ALLEGES THAT; HE ASK DEFENDANT, DR. GNU, HOW HE WERE PLANNING ON REMOVING THIS FOREIGN OBJECT FROM MY PENIS? AND IS A SURGICAL PROCEDURE GOING TO BE PERFORMED? IF SO HOW WERE IT GOING TO BE PERFORMED?
- 29). PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, TOLD PLAINTIFF, THAT A BASIC SURGICAL PROCEDURE WERE GOING TO BE PERFORMED, WITHOUT ANY ANESTHESIA, AND THAT THE PROCEDURE WOULD TAKE APPROXIMATELY THREE - FOUR HOURS TO COMPLETE

30). PLAINTIFF ALLEGES THAT; HE ASK DEFENDANT, DR. GNU, WHAT KIND OF SURGICAL EQUIPMENT WERE GOING TO BE UTILIZED DURING THIS SURGY PROCEDURE? DEFENDANT, DR. GNU, SHOWED PLAINTIFF, AN TOOL THAT WERE APPROXIMATELY 10-15 INCHES LONG WITH SHARP POINTS. PLAINTIFF THEN ASK DEFENDANT, DR. GNU, ^{HE} IS A CERTIFIED UROLOGIST? AND LICENSED TO PERFORM A SURGY PROCEDURE AS A UROLOGIST? HE CLEARLY "STATED" NO . . .

31). PLAINTIFF ALLEGES THAT; HE IMMEDIATELY CONTESTED THE SURGICAL PROCEDURE, DEFENDANT, DR. GNU, WERE GOING TO PERFORM ON PLAINTIFF, DEFENDANT, DR. GNU, TOLD PLAINTIFF, TO EXPLAIN ~~THE~~ I MENT. PLAINTIFF FLAT OUT TOLD DEFENDANT, DR. GNU, I AM NOT CONSENTING TO YOU TO PERFORM A SURGY ON ME AND YOU CANNOT PERFORM SUCH A SURGY, BECAUSE YOU ARE NOT CERTIFIED AS A UROLOGIST. .

32). PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, THEN TOLD PLAINTIFF, YOU GOING TO LET ME TAKE IT OUT ONE WAY NOR OTHER, AS IF I HAD NO CHOICE IN ACCEPTING MEDICAL TREATMENT OR DENYING IT.

33). PLAINTIFF ALLEGES THAT; DEFENDANTS, HENRY, AND CHANDLER, ASK PLAINTIFF, ARE YOU REFUSING TO LET HIM DO THE SURGICAL PROCEDURE, TO REMOVE THE OBJECT? PLAINTIFF STATED YES . . .

34). PLAINTIFF ALLEGES THAT; WHILE IN THE EMERGENCY ROOM, HE WERE SECURED IN A WAIST-BELT, HANDCUFFS, AND LEG IRONS, THE WHOLE TIME WHILE IN THE HEALTH CARE UNIT, AND WHEN I WAS TRANSPORTED BACK TO HIS LIVING UNIT

- 35). PLAINTIFF ALLEGE THAT; WHILE HE WERE SITTING THE TABLE IN THE EMERGENCY ROOM, DEFENDANTS; (LT. GORMAN, LT. SAMBDMAN, (SGT. WICKS, (C/O GILLETTE, (C/O LINDBLOOM, (C/O HESS, AND SEVERAL OTHER UNIDENTIFIED CORRECTIONAL OFFICER'S CAME INTO THE EMERGENCY ROOM, WHERE PLAINTIFF WERE AT
- 36). PLAINTIFF ALLEGE THAT; DEFENDANTS, HENRY, CHANDLER, AND DR. GUN, ASK PLAINTIFF, IS HE GOING TO CONCENT TO THE SURGY TO GET THE OBJECT FROM PENES? AGAIN PLAINTIFF, CONTESTED THE PROCEDURE AND PRACTICE OF THE SURGY
- 37). PLAINTIFF ALLEGE THAT; DEFENDANTS, HENRY, AND CHANDLER, TOLD DEFENDANTS, LT. GORMAN, AND LT. SAMBDMAN, TO USE WHATEVER FORCE NECESSARY TO GET HIM TO COMPLY WITH THE SURGY. PLAINTIFF, YELLED OUT I HAVE A RIGHT TO REFUSE MEDICAL TREATMENT AND/OR SERVICES.
- 38). PLAINTIFF ALLEGE THAT; DEFENDANTS, SGT. WICKS, C/O HESS, C/O GILLETTE, C/O LINDBLOOM, AND SEVERAL UNIDENTIFIED OFFICER'S, STARTED PICKING PLAINTIFF UP, TO REMOVE HIS CLOTHING, AND WHEN PLAINTIFF YELLED OUT LOUD TO STOP, THAT'S WHEN DEFENDANTS, SGT. WICKS, C/O GILLETTE, BOTH STARTED HITTING PLAINTIFF, AND KNOCKING PLAINTIFF TO THE FLOOR
- 39). PLAINTIFF ALLEGE THAT; WHILE ON THE FLOOR OF THE EMERGENCY ROOM, DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, SGT. WICKS, C/O HESS, C/O GILLETTE, C/O LINDBLOOM, AND SEVERAL UNIDENTIFIED OFFICER'S ALL STARTED STOMPING, KICKING, AND HITTING PLAINTIFF WHILE ON THE EMERGENCY ROOM FLOOR. SECURED AT RESTRAINTS

- 40). PLAINTIFF ALLEGES THAT; THIS BEATING WENT ON FOR APPROXIMATELY 3-5 MINUTES, AND THAT'S WHEN DEFENDANTS, HENRY, AND CHANDLER, ASK PLAINTIFF, IS HE GOING TO ALLOW THE SURGY TO BE PERFORMED? AGAIN PLAINTIFF, CONTESTED THE PROCEDURE AND PRACTICE OF THE SURGY TO BE PERFORMED. DEFENDANTS, HENRY, AND CHANDLER, AGAIN INSTRUCTED DEFENDANTS, LT. GORMAN, AND LT. SAMBDMAN, TO DO WHAT THEY GOT TO DO
- 41). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, ORDERED, DEFENDANTS, C/O GILLETTE, C/O HESS, C/O LINDBLOOM, SGT. WICKS, AND SEVERAL UNIDENTIFIED OFFICER'S TO PICK ME UP AND PUT ME ON THE TABLE. THE DEFENDANTS, C/O GILLETTE, C/O HESS, C/O LINDBLOOM, SGT. WICKS, AND SEVERAL UNIDENTIFIED OFFICER'S PICKED PLAINTIFF UP OVER THEIR HEAD'S AND FORCEFULLY SLAMMED PLAINTIFF ONTO HIS BACK OF THE EMERGENCY TABLE
- 42). PLAINTIFF ALLEGES THAT; DEFENDANTS, C/O HESS, C/O GILLETTE, C/O LINDBLOOM, AND SGT. WICKS, ALL STARTED HITTING PLAINTIFF IN HIS BODY AREA AND FACE, WHILE LT. GORMAN AND LT. SAMBDMAN REPEATLY CHOKED PLAINTIFF UNTIL PLAINTIFF WENT UNCONSCIOUS.
- 43). PLAINTIFF ALLEGES THAT; WHEN GAIN CONSCIOUS BACK, HIS JUMPSUIT WERE DOWN TO HIS ANKLES. PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, AND AN UNIDENTIFIED FEMALE DOCTOR WERE ABOUT TO PERFORM A SURGY WITHOUT PLAINTIFF CONCENT

- 44). PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, STUCK A 10-15" INCHES SURGICAL TOOL INTO PLAINTIFF, PENIS; DEFENDANT, DR. GNU, JAMMED THIS SURGICAL TOOL AROUND IN PLAINTIFF PENIS FOR APPROXIMATELY 1 1/2 TO 2 HOURS, WITHOUT ANY ANESTHESIA. .
- 45). PLAINTIFF ALLEGES THAT; HE PLEADED FOR DEFENDANT, DR. GNU, TO STOP, BUT HE INSISTED ON PERFORMING THE SURGICAL PROCEDURE AND PRACTICE ON PLAINTIFF, FINALLY DEFENDANT, DR. GNU, STOPPED AFTER REALIZING PLAINTIFF PENIS WAS BLEEDING, AND HIS ATTEMPTS WERE GOING TO BE UNSUCCESSFUL. . .
- 46). PLAINTIFF ALLEGES THAT; DEFENDANT, DR. GNU, TOLD DEFENDANTS, HENRY, AND CHANDLER, THAT HE WON'T BE ABLE TO REMOVE THE FOREIGN OBJECT FROM PLAINTIFF, PENIS, AND STATED THAT HE WAS DONE WITH ME. . . .
- 47). PLAINTIFF ALLEGES THAT; DEFENDANTS, HENRY, AND CHANDLER, TOLD DEFENDANTS, LT. GORMAN, AND LT. SAMBDMAN, TO TAKE PLAINTIFF, BACK TO HIS LIVING UNIT.
- 48). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, SGT. WICKS, C/O GILLETTE, C/O LINDBLOOM, C/O HESS, AND SEVERAL UNIDENTIFIED CORRECTIONAL OFFICER'S TRANSPORTED PLAINTIFF BACK TO HIS LIVING UNIT. . . IN A TRANSPORTATION VAN. 6

- 49). PLAINTIFF ALLEGES THAT; AS HE WAS LEAVING THE HEALTH CARE UNIT DEFENDANT, LT. SAMBDMAN, SLAMMED A PLEXIGLASS SHIELD INTO PLAINTIFF FACE AREA REPEATEDLY, ALMOST KNOCKING PLAINTIFF DOWN THE STAIRS
- 50). PLAINTIFF ALLEGES THAT; WHILE HE WAS IN THE TRANSPORTATION VAN, BEING TRANSPORTED BACK TO HIS LIVING UNIT, DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, C/O GILLETTE, C/O LINDBLOOM, C/O HESS, AND SGT. WICKS, ALL STARTED HITTING AND KICKING ON PLAINTIFF, WHILE ON THE VAN FLOOR . . .
- 51). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN STARTED CHOKING PLAINTIFF, REPEATEDLY UNTIL PLAINTIFF HAD WENT UNCONSCIOUS AND DEFECATED ONTO HIMSELF . . .
- 52). PLAINTIFF ALLEGES THAT; WHEN HE ARRIVED AT HIS LIVING UNIT DEFENDANTS, C/O GILLETTE, C/O LINDBLOOM, C/O HESS, SGT. WICKS, AND SEVERAL UNIDENTIFIED OFFICER'S, HAD TO CARRY PLAINTIFF TO HIS LIVING UNIT AND CELL LOCATION . .
- 53). PLAINTIFF ALLEGES THAT; WHILE BEING CARRIED BY THE DEFENDANTS, DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, REPEATEDLY HIT PLAINTIFF IN HIS FACE AND HEAD . . .
- 54). PLAINTIFF ALLEGES THAT; HE WAS TAKEN TO HIS CELL, THE RESTRAINTS WERE REMOVED FROM PLAINTIFF, BUT DEFENDANT, LT. GORMAN, HANDCUFFED PLAINTIFF TO HIS CELL DOOR, BACKWARD, AND THE PLAINTIFF REMAINED THAT WAY FROM SEVERAL HOURS. NAKED . .

- 55). PLAINTIFF ALLEGE THAT; DEFENDANTS, HENRY, AND CHANDLER, AND DR. GNU, ALL STOOD THERE AND WATCHED THE DEFENDANTS, REPEATEDLY STOMP, KICK, CHOKER, AND SLAME. PLAINTIFF WHILE IN THE HEALTH CARE UNIT EMERGENCY ROOM . . .
- 56). PLAINTIFF ALLEGE THAT; DEFENDANTS HENRY, CHANDLER, AND DR. GNU, FAILED AND REFUSED TO INTERVENE IN THE EXCESSIVE USE FORCE BEING USED ON PLAINTIFF. AND ORDERING DEFENDANTS TO USE WHATEVER FORCE NECESSARY TO GET PLAINTIFF TO COMPLY . .
- 57). PLAINTIFF ALLEGE THAT; DEFENDANTS, HENRY, CHANDLER, LT. GORMAN, LT. SAMBDMAN, C/O GILLETTE, C/O LANDBLOOM, C/O HESS, AND SEVERAL UNIDENTIFIED, CORRECTIONAL OFFICER'S, STOOD AND WATCHED DEFENDANT DR. GNU, AND AN UNIDENTIFIED FEMALE DOCTOR, USE EXCESSIVE USE OF FORCE UPON PLAINTIFF, BY STICKING AN SURGICAL TOOL INTO PLAINTIFF PONES, REPEATEDLY. AND FAILING AND REFUSING TO INTERVENE
- 58). PLAINTIFF ALLEGE THAT; SEVERAL UNIDENTIFIED CORRECTIONAL OFFICER'S, DRESSED IN FULL PROTECTIVE GEAR APPROACHED PLAINTIFF CELL FRONT ARMED WITH; PLEXIGLASS SHIELD; A BATON; AND CHEMICAL AGENTS
- 59). PLAINTIFF ALLEGE THAT; THE UNIDENTIFIED CORRECTIONAL OFFICER'S, ESCORTED PLAINTIFF TO ANOTHER CELL, THAT HAD MACE A.K.A. (PEPPER MACE) ALL OTHER THE WALLS, BED, AND FLOOR, DUE TO AN INMATE BEING SPRAYED WITH CHEMICAL AGENTS, ON THE DATE IN QUESTIONS .

(60) • PLAINTIFF ALLEGES THAT; ONE OF THE UNIDENTIFIED CELL EXTRACTION TEAM MEMBER, WHILE PLAINTIFF, WERE LYING DOWN ON THE BED, ON HIS STOMACH IN RESTRAINTS, SPREAD PLAINTIFF BUTTOCKS, WHILE THE OTHER OFFICER, USED A VIDEO CAMERA TO LOOK INTO AND AT PLAINTIFF RECTUM . . .

(61) • PLAINTIFF ALLEGES THAT; THE UNIDENTIFIED CELL EXTRACTION TEAM MEMBERS, WHILE PLAINTIFF, WERE LYING DOWN ON THE BED, ON HIS STOMACH IN RESTRAINTS, FORCEFULLY, BENT PLAINTIFF LEG'S IN AN UPWARD LIKE POSITION, AS IF THEY WERE TRYING TO HOGTIE PLAINTIFF LEG TO THE HANDCUFF'S BEHIND HIS BACK . . .

(62) • PLAINTIFF ALLEG. THAT; DEFENDANTS C/O FORD, R/N SCHAVE, AND SEVERAL OTHER UNIDENTIFIED PRISON-OFFICIAL'S, STOOD THERE AND ALLOW THE CELL EXTRACTION TEAM MEMBER'S, TO BEND PLAINTIFF LEG'S TOWARDS HIS BACKAREA, AND FAILED AND REFUSED TO INTERVENE IN SUCH EXCESSIVE USE OF FORCE

(63) • PLAINTIFF ALLEGES THAT; THIS ACTION IS AGAINST ALL KNOWN AND UNKNOWN DEFENDANTS, WHO WERE PERSONALLY INVOLVED OR HAD THE OPPORTUNITY TO INTERVENE AND FAILED AND REFUSED TO DO SO ARE RESPONSIBLE FOR DAMAGES .

(64) • PLAINTIFF ALLEGES THAT; FOR THE ACTION AND INACTIONS DESCRIBED ABOVE, THE DEFENDANTS HAS USED UNJUSTIFIABLE USE OF FORCE UPON PLAINTIFF, AND IN DOING SO, FAILED AND REFUSED TO INTERVENE IN SUCH FORCE. SO THUS, THEREFORE THE DEFENDANTS ACTED IN BAD-FAITH IN THE PERFORMANCES OF THEIR INDIVIDUAL AND OFFICIAL CAPACITIES, IN VIOLATION OF THE "EIGHT" AMENDMENTS . . .

DELIBERATE INDIFFERENCE TO PLAINTIFF
SERIOUS MEDICAL NEEDS . . .

(65). PLAINTIFF, ALLEGE THAT; HE SUSTAINED SEVERAL INJURIES AS AN RESULT OF "EXCESSIVE USE OF FORCE" AND FOR FAILURE TO PROVIDE MEDICAL TREATMENT AND/OR SERVICES, OR AN UROLOGIST TO HAVE FOREIGN OBJECT REMOVED

- (A). MEGRAIN HEADACHES. (B) DIZZY SPELLS. (C). UPPER AND LOWER BACK INJURIES. (d). CUTS AND BRUSED ON ANKLES AND WRISTS
- (E). BUSTY LIP. (F). BRUSES ON RIBS-CAGES. (G). SWOLLEN JAW.
- (H). SMALL CONCUSSION ON BACK OF THE HEAD. (I). SWELLNESS IN PENIS,
- (J). DIFFICULTIES URINATING. (K). BURNING WHEN URINATING . .
- (L). GREENISH LIKE SUBSTANCE DISCHARGING FROM PENIS . . .
- (M). BLOOD IN URINE . . (N). IRREPAIRABLE INJURY
- (O). BLADDER, SWELLNESS AND PAIN . . . (P). INJURED KNEES . .

(66). PLAINTIFF, ALLEGES THAT; HE REQUESTED MEDICAL TREATMENT AND/OR SERVICES, TO THE DEFENDANTS; HENRY, CHANDLER, LT. GORMAN LT. SAMBDMAN, SGT. WICKS, C/O GILLETTE, C/O LINDLOOM, C/O HESS, DR. GUN, DR. POWERS, C/O FORD, R/N SCHAVE, R/N CRIPPER. AND ALL KNOWN AND UNKNOWN, PRISON-MEDICAL AND SECURITY PERSONNEL'S FOR THE ABOVE INJURIES

(67). PLAINTIFF, ALLEGE THAT; HE REPEATEOLY REQUESTED FOR MEDICAL TREATMENT AND/OR SERVICES, TO THE ABOVE NAMED DEFENDANTS, AND UNKNOWN DEFENDANTS, WHICH THEY ALL ONLY DID ILL-WILL TOWARDS PLAINTIFF COMPLAINTS, FOR MEDICAL TREATMENT AND/OR SERVICES

68). PLAINTIFF ALLEGES THAT; ALL KNOWN AND UNKNOWN DEFENDANTS, IN PARAGRAPH # 66,; FAILED AND HAD REFUSED TO PROVIDE PLAINTIFF, ANY MEDICAL TREATMENT AND/OR SERVICES, FOR THE INJURIES PLAINTIFF SUSTAINED, FROM THE USE OF EXCESSIVE FORCE.

69). PLAINTIFF ALLEGES THAT; DEFENDANTS, DR. POWERS, DR. GNU, HAD INTENTIONALLY LEFT THE FOREIGN OBJECT STUCK INSIDE THE PLAINTIFF, URETHRA FROM APRIL /2006 - DECEMBER /2006. WHICH PLAINTIFF, HAD DIFFICULTIES URINATING, DUE TO OBJECT BLOCKING-UP THE URETHRA . . .

70). PLAINTIFF ALLEGES THAT; HE COMPLAINED TO DEFENDANTS, DR. POWERS, DR. GNU, AND R/N CALIFER, THAT PLAINTIFF, IS HAVING DIFFICULTIES URINATING, AND THAT A EXTREME BURNING SENSATION AND PAIN COMES UPON PLAINTIFF, WHENEVER I URINATE . . .

71). PLAINTIFF ALLEGES THAT; HE COMPLAINED TO DEFENDANTS, DR. POWERS, DR. GNU, R/N CALIFER, AND ALL KNOWN AND UNKNOWN DEFENDANTS, THAT BLOOD AND A GREENISH LIKE SUBSTANCE DISCHARGES FROM PLAINTIFF, WHENEVER I URINATE . . .

72). PLAINTIFF ALLEGES THAT; DEFENDANTS, WHETHER KNOWN OR UNKNOWN, PREVENTED PLAINTIFF, FROM PARTICIPATING IN HIS DAILY ACTIVITIES, BY FAILING AND REFUSING TO PROVIDE PLAINTIFF MEDICAL TREATMENT AND/OR SERVICES . . .

- 73) • PLAINTIFF, ALLEGES THAT; ALL DEFENDANTS WHETHER KNOWN OR UNKNOWN, CAUSED PLAINTIFF TO BE SUBJECTED TO INFLECTION OF PAIN AND SUFFERING, BY KNOWINGLY, INTENTIONALLY, RECKLESSLY AND MALICIOUSLY, SADISTICALLY DEPRIVED PLAINTIFF, MEDICAL TREATMENT AND/OR SERVICES . . .
- 74) • PLAINTIFF, ALLEGES THAT; FOR THE ACTION OR INACTIONS OF ALL KNOWN AND UNKNOWN DEFENDANTS, FAILURE AND REFUSAL TO PROVIDE PLAINTIFF, MEDICAL TREATMENT AND/OR SERVICES, AND THE CONTINUANCES AND WILLFULLY DEPRIVING PLAINTIFF MEDICAL TREATMENT, CONSTITUTES DELIBERATE INDIFFERENCE TO PLAINTIFF SERIOUS MEDICAL NEEDS . . .
- 75) • PLAINTIFF, ALLEGES THAT; THIS COMPLAINT IS ALSO FILED AGAINST ALL UNKNOWN PRISON MEDICAL AND SECURITY PERSONNEL'S WHO ALSO DENIED PLAINTIFF, MEDICAL TREATMENT AND/OR SERVICES, OR HAS FAILED AND HAS REFUSED TO INTERVENE IN SUCH DENIAL OF MEDICAL TREATMENT AND/OR SERVICES . . .
- 76) • PLAINTIFF, ALLEGES THAT; FOR THE ACTION OR INACTIONS OF ALL UNKNOWN DEFENDANTS FAILURE AND REFUSAL TO PROVIDE PLAINTIFF MEDICAL TREATMENT AND/OR SERVICES, AND THEIR CONTINUANCES TO DEPRIVE PLAINTIFF, MEDICAL TREATMENTS AND/OR SERVICES, CONSTITUTES, DELIBERATE INDIFFERENCE TO PLAINTIFF SERIOUS MEDICAL NEEDS, IN VIOLATION OF THE "EIGHT" AMENDMENT . . .

PROCEDURAL AND DUE PROCESS VIOLATIONS

- 77). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, C/O FORD, LT. SAMBDMAN, FAISELY ACCUSED PLAINTIFF OF VIOLATION OF DEPARTMENT RULES, IN RETALIATION FOR UTILIZING THE GRIEVANCE PROCEDURE, AND FOR COMPLAING ABOUT THE EXCESSIVE USE OF FORCE, AND TO COVER-UP THE EXCESSIVE FORCE INCIDENTS. . .
- 78). PLAINTIFF ALLEGES THAT; DEFENDANTS IN PARAGRAPH# — ON OR ABOUT APRIL 13 2006, CHARGED PLAINTIFF WITH WITH SERIOUS RULE VIOLATIONS IN RETALIATION, FOR PLAINTIFF — EXERCISING HIS PROTECTIVE CONSTITUTIONAL RIGHTS . . .
- 79). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, AND MCCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF, WITH A 24-HOURS NOTICE. . .
- 80). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, MCCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF, WITH AN OPPORTUNITY TO CALL WITNESSES ON HIS BEHALF . . .
- 81). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, MCCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF, WITH AN OPPORTUNITY TO PRESENT DOCUMENTATION IN MY DEFENSE . . .

82). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, MCCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF, THEIR REASONS FOR THEIR FINDING AND THE EVIDENCE RELIED UPON

83). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, MCCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF WITH STAFF-ASSISTANCE, IN THE PREPARATION AND PRESENTATION OF PLAINTIFF DEFENSE

84). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, MCCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO SERVED PLAINTIFF A COPY OF DISCIPLINARY REPORTS, WITHIN THE "EIGHT" DAYS TIME FROM

85). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, MCCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF A COPY OF THE ADJUSTMENT COMMITTEE SUMMARIES

86). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, MCCANN, AND ALL UNKNOWN DEFENDANTS, DEPRIVED AND FAILED TO PROVIDE PLAINTIFF AN IMPARTIAL FACT-FINDER, BY NOT ALLOWING SOMEONE REPRESENTING A COUNSELOR STAFF, ON THE COMMITTEE

87). PLAINTIFF ALLEGES THAT; ALL KNOWN AND UNKNOWN DEFENDANTS HAS VIOLATED PLAINTIFF RIGHTS BY FINDING HIM GUILTY OF ALL CHARGES, IN RETALIATION FOR HIS EXERCISING CONSTITUTIONAL RIGHTS. AND IMPOSING DISCIPLINARY ACTION, FOR EXERCISING HIS PROTECTOR RIGHTS. IN VIOLATION OF THE FIRST AND FOURTEENTH AMEND.

4
RETALIATION FOR EXERCISING HIS
CONSTITUTIONAL PROTECTED RIGHTS

- 88). PLAINTIFF ALLEGES THAT; HE BEGAN TO COMPLAINE ABOUT THE EXCESSIVE USE FORCE, THAT WERE USED UPON PLAINTIFF TO OTHER PRISON OFFICIAL'S, AND FILING GRIEVANCE REGARDING THE INCIDENTS THAT OCCURRED ON OR ABOUT APRIL 13 2006
- 89). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, C/O FORD, NOTICED THAT PLAINTIFF HAD SUBMITTED SEVERAL WRITTEN GRIEVANCE'S TO HIS COUNSELOR, RELATING TO THE APRIL 13 2006 INCIDENTS. BY PLACING THOSE GRIEVANCE'S IN THE MAIL BAG. WHICH IS LOCATED ON THE WING PLAINTIFF WERE ASSIGNED TO.
- 90). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, ALL CAME TO PLAINTIFF AND TOLD PLAINTIFF, TO RECONSIDER IN FILING THOSE GRIEVANCE'S, AND THAT THEY'LL CONSIDER NOT WRITING PLAINTIFF A DISCIPLINARY REPORT. . . .
- 91). PLAINTIFF ALLEGES THAT; HE TOLD DEFENDANTS, LT. SAMBDMAN, LT. GORMAN, C/O FORD; I HAVE'NT DONE SHIT, FOR YOU TO WRITE ME A DISCIPLINARY REPORT. . . .
- 92). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. GORMAN, LT. SAMBDMAN, AND C/O FORD, TOLD PLAINTIFF. THEY COULD COME UP WITH SOMETHING TO WRITE PLAINTIFF UP FOR. THE DEFENDANT C/O FORD, STATED I CAN TELL A STORY VERY WELL. (IN OTHER WORD'S HE CAN TELL A GOOD LIE ON PRISONERS)

- 93). PLAINTIFF ALLEGES THAT; HE TOLD DEFENDANTS, LT. SAMBDMAN, LT. GORMAN, AND C/O FORD, TO GO TO "HELL" AND DO WHAT THEY HAVE TO DO CAUSE I AM. AT THAT TIME PLAINTIFF NOTICED THAT DEFENDANT, LT. SAMBDMAN, HAD PLAINTIFF, GRIEVANCES IN HIS HAND, RELATING THE APR 13, 2006 INCIDENTS
- 94). PLAINTIFF ALLEGES THAT; DEFENDANT, LT. SAMBDMAN, SLIDED THE GRIEVANCES BACK UNDER PLAINTIFF. CELL DOOR, AND TRIED TO CONVINCE PLAINTIFF IN NOT FILING THOSE GRIEVANCES WITH HIS COUNSELOR. DEFENDANT, LT. SAMBDMAN, ALSO TRIED TO BRIBE, PLAINTIFF, WITH A PROMISE TO GIVE PLAINTIFF A EXTRA FOOD TRAY AND TWO - CIGARETTE'S. WHICH PLAINTIFF DECLINED THE BRIBES
- 95). PLAINTIFF ALLEGES THAT; HE SLIDED HIS GRIEVANCES BACK UNDER HIS CELL DOOR, AND YELLED OUT LOUD TO PUT MY GRIEVANCES BACK IN THE MAIL BAG, AND STOP TRYING TO BRIBE ME. THE PLAINTIFF DID THAT SO THAT OTHER PRISONER AND STAFF, COULD SEE AND HEAR WHAT WAS GOING ON
- 96). PLAINTIFF ALLEGES THAT; DEFENDANTS, LT. SAMBDMAN, PICKED THE GRIEVANCES OFF OF THE FLOOR AND TOLD PLAINTIFF, THAT I WILL REGRET IT, AND WALKED OFF, AND PLACED GRIEVANCES BACK INTO THE MAIL BAG . . AND DEFENDANTS, LT. GORMAN AND C/O FORD LEFT PLAINTIFF CELL FRONT

- 97). PLAINTIFF ALLEGE THAT; DEFENDANTS, LT. SAMBDMAN, LT. GORMAN, AND C/O FORD, SEEN THAT PLAINTIFF COULD NOT BE BRIBED. THATS WHEN DEFENDANTS, WENT AND WROTE PLAINTIFF, A DISCIPLINARY REPORTS, FOR UTILIZING THE GRIEVANCE PROCEDURE. . . .
- 98). PLAINTIFF ALLEGE THAT; DEFENDANTS, LT. SAMBDMAN, LT. GORMAN, AND C/O FORD, WROTE AND FILED FALSE DISCIPLINARY CHARGES AGAINST PLAINTIFF, IN RETALIATION FOR PLAINTIFF UTILIZING THE GRIEVANCE PROCEDURE AND COMPLAING TO OTHER PRISON'S OFFICIAL'S ABOUT THE APRIL 13 2006, INCIDENTS
- 99). PLAINTIFF ALLEGE THAT; DEFENDANTS, LT. MITCHELL, C/O HAMILTON, AND MCCANN, AND ALL UNKNOWN DEFENDANTS, FOUND PLAINTIFF GUILTY OF ALL CHARGES, IN RETALIATION, FOR THE PLAINTIFF UTILIZING THE GRIEVANCE PROCEDURE AND FOR PLAINTIFF, CONTINUING COMPLAING TO PRISON'S OFFICIAL'S ABOUT THE APRIL 13, 2006 INCIDENTS
- 100). PLAINTIFF ALLEGE THAT; DEFENDANTS, HENRY, CHANDLER, SGT. WICKS, C/O GILLETTE, C/O LINDBLOOM, C/O HESS, R/N SCHAVE, LT. MITCHELL, C/O HAMILTON, MCCANN, AND ALL UNKNOWN DEFENDANTS, KNOW THAT THOSE DISCIPLINARY REPORTS, WERE FABRICATED AND DONE IN RETALIATION FOR PLAINTIFF, UTILIZING THE GRIEVANCE PROCEDURE AND COMPLAING ABOUT THE APRIL 13 2006, INCIDENTS

101). PLAINTIFF ALLEGE THAT; DEFENDANTS, HENRY, CHANDLER, MCCANN, SGT. WEEKS, C/O GILLETTE, C/O LINDSBLOOM, C/O HESS, C/O HAMILTON, LT. MITCHELL, AND ALL UNKNOWN DEFENDANTS, FAILED AND HAD REFUSED TO INTERVENE IN THE RETALIATORY CONDUCTS, TAKEN AGAINST PLAINTIFF, FOR UTILIZING THE GRIEVANCE PROCEDURE AND FOR COMPLAINTING TO PRISON'S OFFICIAL'S ABOUT THE APRIL 13, 2006 INCIDENTS

102). PLAINTIFF ALLEGE THAT; DEFENDANTS, LT. SAMBDMAN, LT. GORMAN, C/O FORD, RETALIATED AGAINST PLAINTIFF, FOR UTILIZING THE GRIEVANCE PROCEDURE, AND FOR COMPLAINTING ABOUT THE APRIL 13 2006 INCIDENTS, AND TO COVER-UP THE APRIL 13 2006 INCIDENTS, TO MAKE IT SEEM AS IF WHAT THEY DID WAS JUSTIFIED

103). PLAINTIFF ALLEGE THAT; FOR THE ACT'S DESCRIBED ABOVE THE DEFENDANTS WHETHER KNOWN OR UNKNOWN, ALL RETALIATED AGAINST PLAINTIFF FOR UTILIZING THE GRIEVANCE PROCEDURE AND COMPLAINTING TO PRISON OFFICIAL'S ABOUT THE APRIL 13 2006 INCIDENTS, AND IN ORDER TO COVER-UP THE APRIL 13 2006 INCIDENTS, TO MAKE IT SEEM AS IF, THEY WERE JUSTIFIED FOR DOING WHAT THEY DID TO PLAINTIFF. IN VIOLATION OF PLAINTIFF, FIRST AND FOURTEENTH AMENDMENTS RIGHTS TO THE CONSTITUTIONS .

104). PLAINTIFF ALLEGE THAT; THIS ACTION IS FILE AGAINST ALL KNOWN AND UNKNOWN DEFENDANTS, WHO ARE RESPONSIBLE IN DAMAGES

COUNT # 5
STATE TORT CLAIM FOR
ASSAULT AND BATTERY

105) • PLAINTIFF, REALLEGE PARAGRAPHS (1-105). AS IF SET FORTH FULL HEREIN.

COUNT # 6

DECLARATORY RELIEF

106) • PLAINTIFF, REALLEGE PARAGRAPHS (1-107). AS IF SET FORTH FULLY HEREIN.

THERE IS AN ACTUAL CONTROVERSY BETWEEN THE PARTIES REQUIRING THE COURT TO DECLARE THE RIGHTS, AND OTHER LEGAL RELATIONS OF THE PARTIES.

COUNT # 7

INJUNCTION RELIEF

107) • PLAINTIFF, REALLEGE PARAGRAPHS (1-107). AS IF SET FORTH FULLY HEREIN.

UNLESS ENJOINED FROM DOING SO, DEFENDANTS WILL CONTINUE TO WILLFULLY VIOLATE THE RIGHTS OF PLAINTIFF. THESE CONTINUING VIOLATIONS CONSTITUTES IRREPARABLE INJURY FOR WHICH PLAINTIFF, HAVE NO ADEQUATE REMEDY AT LAW

WHEREFORE, PLAINTIFF, REQUEST THIS COURT TO GRANT THE FOLLOWING RELIEF.

- A). DECLARE THAT THE ACTIONS AND INACTIONS OF DEFENDANTS DESCRIBED HEREIN HAVE VIOLATED AND CONTINUE TO VIOLATE THE PLAINTIFF RIGHTS, UNDER THE FIRST, EIGHT, AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTIONS
- B). ENJOIN DEFENDANTS FROM ENGAGING IN ANY ACTION OR CONDUCT, OR FAILING TO ACT IN ANY WAY, THAT VIOLATE THE PLAINTIFF CLEARLY ESTABLISHED CONSTITUTIONAL RIGHTS MENTIONED ABOVE
- C). ORDER DEFENDANTS TO TAKE ALL ACTION NECESSARY TO REMEDY THE VIOLATIONS OF PLAINTIFF, CLEARLY ESTABLISHED STATUTORY AND UNITED STATES CONSTITUTIONAL RIGHTS, MENTIONED ABOVE
- D). ORDER DEFENDANTS, TO EXPUNGE ALL DISCIPLINARY REPORTS WRITTEN IN RETALIATION FOR PLAINTIFF UTILIZING THE GRIEVANCE PROCEDURE AND FOR COMPLAINTING TO PRISONS OFFICIALS ABOUT THE APRIL 13, 2006 INCIDENTS, AND TRYING TO COVER-UP THE APRIL 13, 2006, INCIDENTS . . . OR TO GRANT A NEW HEARING SO THAT PLAINTIFF CAN PRESENT A DEFENSE
- E). AWARD PLAINTIFF, A JUDGMENT AGAINST DEFENDANTS SEPARATELY AND JOINTLY FOR COMPENSATORY DAMAGES IN THE AMOUNT OF FIFTY-ONE (\$ 51,000,000,00) MILLION DOLLARS
- F). AWARD PLAINTIFF, A JUDGMENT AGAINST DEFENDANTS, SEPARATELY AND JOINTLY FOR PUNITIVE DAMAGES, IN THE AMOUNT OF FIFTY-ONE (\$ 51,000,000,00) MILLION DOLLARS

- G) • AWARD PLAINTIFF, A JUDGMENT AGAINST DEFENDANTS, SEPARATELY AND JOINTLY FOR NOMINAL DAMAGES, IN THE AMOUNT OF FIFTY-ONE (\$ 51, 000, 000, 00) MILLION DOLLARS, FOR PLAINTIFF EMOTIONAL MENTAL DISTRESS . . .
- H) • AWARD PLAINTIFF, A JUDGMENT AGAINST DEFENDANTS, SEPARATELY AND JOINTLY FOR ATTORNEY'S FEES AND COSTS
- I) • AWARD PLAINTIFF, A JUDGMENT AGAINST, DEFENDANTS, SEPARATELY AND JOINTLY, FOR ANY OTHER RELIEF THAT THIS COURT DEEMS JUST AND PROPER

Respectfully submitted

Christopher Knorr

1361090

200 E. SUPERMAX, RD

TAMMS, ILLINOIS 62988

CERTIFICATE OF SERVICE

I, CHRISTOPHER KNOX, HEREBY CERTIFIES THAT A TRUE AND CORRECT 1-ORIGINAL AND 18 COPIES OF PLAINTIFF CIVIL RIGHTS COMPLAINT, HAS BEEN SERVED UPON . . .

To: Clerk of the Court

211 South Court, Federal Bld.

Rockford, Illinois 61101

BY CAUSING TO BE PLACED IN AN PREPAID ENVELOPE DULY SWORN UPON OATH DEPOSES, COMPLAINT IN THE UNITED STATES MAIL. ADDRESSED TO THE ABOVE NAMED PARTY. AT THE ABOVE ADDRESS. IN TAMMS. ILLINOIS. ON 13 DAY OF DECEMBER 2007. . .

Respectfully submitted

Christopher Knox 1361090

200 E. SUPERMAX, rd

TAMMS. ILLINOIS 62988